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DEC 18 1991

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Federal Communications Commission  
2025 M Street, Room 5322  
Washington, DC 20554

✓ re: RM 7869 (American Radio Relay League)

RM-7869

Sirs:

I wish to file the following comments in opposition to the referenced action.

The Commission has in the past generally followed the policy that the Amateur Service was best served by allowing the maximum possible degree of self-regulation consistent with the needs of the public at large. This has, I feel, proven a wise and correct policy which has allowed the Amateur Service to change and develop in a relatively efficient fashion in meeting the needs of the Ham community.

In RM 7869 the ARRL has requested that the Commission place its formal regulatory power behind a plan they have devised to accommodate the desires of a small but apparently influential group within its ranks at the expense of a considerably larger group of Amateurs. On the face of it this would appear to be an inappropriate use of the Commission's regulatory power and an unwise departure from past practice.

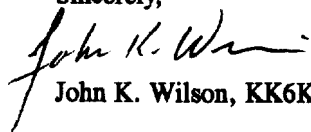
Beyond these general observations I wish to take specific exception with several points in the ARRL's proposal.

First, as the ARRL acknowledges, in certain urban areas of the country the recently eviscerated 222 MHz band is now virtually at full saturation, with every available repeater channel in use, generally by several overlapping machines. The petition recognizes that the loss of the lower portion of the band would almost surely put a number of repeaters - which are the fruit of the labor and monetary investment of hundreds of Amateurs - off the air. This is justified in the petition as necessary so that some unknown but relatively small number of Hams can carry on experimentation with various weak-signal modes, ostensibly to further our collective knowledge of band characteristics. I would counter with the suggestion that the propagation characteristics of the 222 MHz band are already well known, and this is insufficient justification to legislate a nation-wide "window" of such a magnitude in an already saturated band.

Further, the ARRL petition insists that the requirement for weak-signal work is such that the segment must be cleared nation-wide, precluding the kind of "local option" planning which has in the past worked well in balancing the needs of the Amateur community on a case-by-case basis. I would submit that it is not in fact necessary or logical that a full band segment be devoted to weak-signal use in all parts of the country. The urban Los Angeles area is not, for example, what one would term "good moon-bounce country". Few neighborhoods offer antenna sites and the overall electromagnetic noise floor in Los Angeles is astonishingly high.

In summary, I respectfully request that the ARRL's petition be denied. A voluntary band plan with local option can provide a high percentage of the nation's weak-signal devotees with the clear space they require without the bull-in-a-china shop effect produced by legislative fiat.

Sincerely,



John K. Wilson, KK6KU

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